

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

Eric Gravel,)	
)	
Plaintiff,)	
)	
v.)	Civil Case No. 2:23-cv-108
)	
City of Winooski, <i>et al.</i> ,)	
)	
Defendants.)	

DECLARATION OF ELAINE WANG

I, Elaine Wang, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the City Manager for the City of Winooski and I have held that position since May of 2022.

2. As City Manager, I work out of Winooski City Hall. The City's offices, including the City Clerk's Office and Police Department, are located at Winooski City Hall.

3. I have witnessed or been advised of several incidents of threatening behavior on the part of Eric Gravel. In early April 2023, Mr. Gravel was threatening and harassing employees in the City Clerk's office at City Hall. Mr. Gravel's threatening behavior at City Hall created fear among City employees.

4. In April 2023, Winooski City Hall was closed to the public on Tuesdays but staff still worked in the building. On Tuesday, April 11, 2023, Mr. Gravel approached the ground level windows of the Clerk's Office and started performing martial arts moves. He was banging on the windows and shouting loudly to open the doors and let him in. This caused alarm among the City Clerk's Office staff.

5. Mr. Gravel exhibited escalating behavior, yelling through the main door of City Hall that City staff could not prevent him from entering the building and that once he accessed the building they could not make him leave. He went downstairs to the Police Department still shouting and returned to the main level and attempted to video record staff through the windows. Mr. Gravel's conduct disrupted the performance of City business. I spoke with the employees in the building and they were visibly unsettled and upset.

6. As a result of Mr. Gravel's escalating threatening behavior causing fear among City employees, I met with former Winooski Police Chief Rick Hebert to discuss safety and security. After a discussion, we made the decision to have a Notice Against Trespass issued in an effort to prevent Mr. Gravel from further harassing employees on City property.

7. Mr. Gravel was served with the Notice Against Trespass when he came to City Hall the next day, on April 12, 2023. *See* Incident Report 23WS001726, including a copy of the Notice, attached hereto as Exhibit A-1.

8. At the time the Notice Against Trespass was served upon Mr. Gravel, the Police Chief and I perceived Mr. Gravel as a real and genuine threat to the safety of City officials and City employees as well as to members of the public who conduct business on City property.

9. Upon information and belief, Mr. Gravel was not living in Winooski at the time the Notice Against Trespass was issued and has not lived in Winooski since March 2023.

10. Even with the Notice Against Trespass Notice in place, he has still threatened and harassed City employees and members of the public going in and out of City Hall, while positioned on the streets and sidewalks around the building. For example, on January 5, 2024, Mr. Gravel harassed and threatened two City employees outside City Hall, threatened an

individual who was leaving the Winooski Police Department, and verbally harassed a Winooski Police Sergeant. *See* Incident Report 24WS000081 attached hereto as Exhibit A-2. As a consequence, I continue to believe that Mr. Gravel poses a threat.

11. Mr. Gravel has communicated with me on several occasions over the last year and has been granted access to City Hall if needed, for instance, to pay a parking ticket.

12. Due to the fact that alternative means exist for Mr. Gravel to address any matters of public concern to the City, for example email correspondence, and due to the fact that upon information and belief Mr. Gravel is not a resident of or voter in Winooski, I do not feel that the City has infringed upon any right of Mr. Gravel's to access City services.

13. The Notice Against Trespass is in effect until April 12, 2024.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED at Winooski, Vermont this 29 day of March 2024.



ELAINE WANG

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